

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

RYAN FARACE,

Defendant

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CRIMINAL NO. CCB-18-18

MOTION FOR FINAL ORDER OF FORFEITURE

The United States of America hereby moves for a final order of forfeiture with respect to the property included in the preliminary order of forfeiture in this case, and in support states the following:

1. On October 3, 2018, the defendant Ryan Farace (the “Defendant”) pled guilty to conspiracy to manufacture, distribute, and possess with intent to distribute alprazolam, in violation of 21 U.S.C. § 846, and conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956. ECF No. 65.

2. On October 11, 2022, the Court entered an Order Amending the Amended Preliminary Order of Forfeiture to Include Subsequently Located Property, ECF No. 110, forfeiting all of the Defendant’s right, title, and interest in the following property to the United States:

- (a) 22.30267654 bitcoin recovered on or about January 7, 2020 from a Bitpay account successfully recreated from a recovery seed seized during execution of a search warrant at the Defendant’s residence on January 16, 2018 (20-DEA-659377); and

- (b) 2.00601444 bitcoin on or about March 11, 2020 through additional analysis of a computer seized during execution of a search warrant at the Defendant's home in Sparks Maryland on January 16, 2018 (20-DEA-661425)

(collectively, the "Subject Property").

3. Pursuant to 21 U.S.C § 853(n)(1), the United States published notice of the forfeitures on the official government website, www.forfeiture.gov, from October 13, 2022 through November 11, 2022. The United States did not send direct notice to any parties, as there were no known potential claimants to the Subject Property identified based on a review of the relevant investigative materials. *See* Declaration of Publication, Exhibit 1.

4. No claims were filed with respect to the Subject Property and the deadline for doing so expired on December 12, 2022—30 days from the last date of publication. *See* 21 U.S.C. § 853(n)(2).

5. As the Defendant's rights in the Subject Property have been forfeited to the United States and no timely third-party claims to the Subject Property have been received, the United States requests that the Court enter a Final Order of Forfeiture forfeiting the Subject Property.

WHEREFORE, the United States respectfully requests that the Court enter a Final Order of Forfeiture of the Subject Property and declares that pursuant to Rule 32.2(c)(2) of the Federal Rules of Criminal Procedure all third-party claims to the Subject Property have been resolved, and its Final Order of Forfeiture is now final with respect to the Subject Property. A proposed order is attached for the convenience of the Court.

Respectfully submitted,

Erek L. Barron
United States Attorney

/s/ _____
Jennifer L. Wine
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion for Final Order of Forfeiture was filed via CM/ECF and served electronically on all parties via that system.

/s/

Jennifer L. Wine
Assistant United States Attorney